

# **EXHIBIT B**

# EXHIBIT O

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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In re <i>Ex Parte</i> Application of Majed Amir Al-Attabi,	:	
<i>Petitioner,</i>	:	
for an Order Pursuant to 28 U.S.C. § 1782 to Take	:	Case No. 1:21-mc-00207(VSB)(RWL)
Discovery for use in Foreign Proceedings Pending	:	
in the Republic of Lebanon.	:	
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**[PROPOSED] PROTECTIVE ORDER**

WHEREAS, on September 3, 2021, the Court granted the application of Petitioner Majed Amir Al-Attabi to take certain discovery in this district for use in the legal proceedings pending between Petitioner and Bank Audi S.A.L. in the Court of First Instance of Beirut under No. 448/2020 and in the Court of Judicial Enforcement of Beirut under No. 211/2021 (collectively, the “Lebanon Proceedings”) [ECF 10]; and

WHEREAS, pursuant to the Court’s September 3, 2021 order, the Petitioner served subpoenas in this district on JPMorgan Chase Bank, N.A., The Bank of New York Mellon, Citibank, N.A., and Standard Chartered Bank (the “Subpoenaed Banks”) seeking production of records reflecting certain U.S. dollar transfers in a format that does not disclose the names or personally identifying information (including account numbers) of any transferor or transferee; and

WHEREAS, the Subpoenaed Banks have requested entry of an appropriate protective order prior to their producing documents and information in response to the Petitioner’s subpoenas as modified by the Court on January 26, 2022 [ECF 34] (the “§ 1782 Subpoenas”);

IT IS HEREBY ORDERED, pursuant to 28 U.S.C. § 1782 and Rule 26(c) of the Federal Rules of Civil Procedure that:

1. Documents and information produced by the Subpoenaed Banks in response to the § 1782 Subpoenas (the “Subpoenaed Information”) shall not be used by any person for any purpose other than prosecuting, defending, or settling the Lebanon Proceedings.

2. Access to the Subpoenaed Information shall be limited to:

- (a) the parties to the above-captioned proceeding and the Lebanon Proceedings;
- (b) counsel for the parties to the above-captioned proceeding and the Lebanon Proceedings (including all attorneys in private law firms representing the parties), as well as their paralegal, technical, secretarial, and clerical personnel who are engaged in assisting in the Lebanon Proceedings (“Counsel”);
- (c) the courts presiding over the Lebanon Proceedings and over any related appellate proceedings, including their clerical personnel (the “Lebanon Courts”);
- (d) persons providing photocopying, document storage, data processing, or litigation support who are employed or retained by Counsel to assist in this proceeding or the Lebanon Proceedings, subject to compliance with Paragraph 3 of this Order;
- (e) experts, consultants, or investigators retained by Counsel for purposes of consulting or testifying in the Lebanon Proceedings, subject to compliance with Paragraph 3 of this Order;
- (f) other non-party witnesses testifying in, or otherwise providing evidence for use in, the Lebanon Proceedings, subject to compliance with Paragraph 3 of this Order;
- (g) any person, with the prior written agreement of the Subpoenaed Bank that produced the Subpoenaed Information, subject to compliance with Paragraph 3 of this Order;
- (h) any person whom this Court or the Lebanon Courts direct may have access;

(i) to the extent that Subpoenaed Information becomes part of, or is reflected in, official records of the Lebanon Courts, any person authorized under Lebanese law to have access to such records.

3. Unless otherwise ordered by this Court or one of the Lebanon Courts, prior to disclosure of Subpoenaed Information to a person authorized under paragraphs 2(d) – (g) of this Order, the disclosing party shall provide to such person a copy of this Order and obtain from such person an executed copy of the Confidentiality Agreement annexed hereto as Exhibit A.

SO ORDERED,

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ROBERT W. LEHRBURGER  
UNITED STATES MAGISTRATE JUDGE

Dated: March \_\_, 2022  
New York, New York

**EXHIBIT A**

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**CONFIDENTIALITY AGREEMENT**

1. My name is \_\_\_\_\_. I am employed as  
\_\_\_\_\_ (state position) by \_\_\_\_\_ (state name and  
address of employer).

2. I have received and read a copy of the Protective Order that has been entered in  
the above captioned proceeding. I understand the provisions of the Protective Order, and agree  
to comply with and be bound by its provisions.

3. I understand that sanctions may be imposed upon me for violation of the  
Protective Order. I consent to personal jurisdiction over me by the United States District Court  
for the Southern District of New York with respect to enforcement of the Protective Order.

Dated: \_\_\_\_\_

Signed: \_\_\_\_\_